

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
ADELINE M. CRUZ)	Case No. 20-32667-KLP
)	Chapter 13
)	
Debtor)	

**MOTION TO EXPEDITE HEARING ON MOTION
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on June 18, 2020.
2. The Debtor has applied for and CMA's Colonial Honda has approved a loan to the Debtor in the amount of \$18,853.95 plus interest at 14.95% per annum to be repaid with 72 equal monthly payments of \$400.60 for the purchase of a 2020 Honda Fit or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because there is a pending motion for relief that has been filed by the lienholder on her current vehicle (a lease). She needs a vehicle to travel to and from work and other matters. She wants to purchase a vehicle that will be hers to keep.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

5. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion, waive the 14-day stay pursuant to Fed. R. Bankr. Proc. 8014(a), and for such other and further relief as is just and proper.

Dated: April 8, 2021

ADELINE M. CRUZ

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
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IN RE:)	
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)	Chapter 13
)	
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **April 14, 2021 at 10:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: April 8, 2021

ADELINE M. CRUZ

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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/s/ James E. Kane
Counsel for Debtor

Label Matrix for local noticing

HVT Ins as Trustee for HLT (Honda Lea

United States Bankruptcy Court

0422-3

Steven L. Higgs, P.C.

701 East Broad Street

Case 20-32667-KLP

Steven L. Higgs, Esq

Richmond, VA 23219-1888

Eastern District of Virginia

9 Franklin Road, S.W.

Richmond

Roanoke, VA 24011-2403

Thu Apr 8 13:13:50 EDT 2021

(p)AMERICAN HONDA FINANCE

Capital One

Capital One Bank (USA), N.A.

P O BOX 168088

Attn: Bankruptcy

by American InfoSource as agent

IRVING TX 75016-8088

Po Box 30285

4515 N Santa Fe Ave

Salt Lake City, UT 84130-0285

Oklahoma City, OK 73118-7901

(p)JPMORGAN CHASE BANK N A

Chisuk Cruz

Citibank North America

BANKRUPTCY MAIL INTAKE TEAM

3003 Norfolk Street

Citibank SD MC 425

700 KANSAS LANE FLOOR 01

Hopewell, VA 23860-4809

5800 South Corp Place

MONROE LA 71203-4774

Sioux Falls, SD 57108-0000

Citibank, N.A.

Comenity/Sephora

Credit One Bank

5800 S Corporate Pl

Attn: Bankruptcy

Attn: Bankruptcy Department

Sioux Falls, SD 57108-5027

Po Box 182125

Po Box 98873

Columbus, OH 43218-2125

Las Vegas, NV 89193-8873

Discover Bank

Discover Financial

Fort Lee FCU

Discover Product Inc

Attn: Bankruptcy

Attn: Bankruptcy

PO BOX 3025

Po Box 3025

4495 Crossings Blvd

New Albany, OH 43054-3025

New Albany, OH 43054-3025

Prince George, VA 23875-1455

Guam Marinas Collectio

JPMorgan Chase Bank, N.A.

LVNV Funding, LLC

414 W Soledad Ave Ste 60

s/b/m/t Chase Bank USA, N.A.

Resurgent Capital Services

Hagatna, GU 96910-5061

c/o Robertson, Anschutz & Schneid, P.L.

PO Box 10587

6409 Congress Avenue, Suite 100

Greenville, SC 29603-0587

Boca Raton, FL 33487-2853

MOHELA

Quantum3 Group LLC as agent for

Synch/PPC

Attn: Bankruptcy

Comenity Capital Bank

Attn: Bankruptcy

633 Spirit Dr

PO Box 788

Po Box 965060

Chesterfield, MO 63005-1243

Kirkland, WA 98083-0788

Orlando, FL 32896-5060

Synchrony Bank

Synchrony Bank/Amazon

USAA Federal Savings Bank

c/o PRA Receivables Management, LLC

Attn: Bankruptcy

Attn: Bankruptcy

PO Box 41021

Po Box 965060

10750 Mcdermott Freeway

Norfolk VA 23541-1021

Orlando, FL 32896-5060

San Antonio, TX 78288-1600

USAA Savings Bank

VW Credit Leasing, Ltd

(p)VOLKSWAGEN CREDIT UNION

10750 McDermott Freeway

c/o VW Credit, Inc.

1401 FRANKLIN BLVD

San Antonio, TX 78230-1649

PO Box 9013

LIBERTYVILLE IL 60048-4460

Addison, Texas 75001-9013

Adeline M. Cruz

James E. Kane

John P. Fitzgerald, III

3003 Norfolk Street

Kane & Papa, PC

Office of the US Trustee - Region 4 -R

Hopewell, VA 23860-4809

1313 East Cary Street

701 E. Broad Street, Ste. 4304

P.O. Box 508

Richmond, VA 23219-1849

Richmond, VA 23218-0508

Suzanne E. Wade

341 Dial 877-996-8484 Code 2385911

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Acura Financial Services

Po Box 168088

Irving, TX 75016-8088

(d)American Honda Finance

Attn: National Bankruptcy Center

Po Box 166469

Irving, TX 75016-0000

Chase Card Services

Attn: Bankruptcy

Po Box 15298

Wilmington, DE 19850-0000

Volkswagon Credit, Inc.

P.O. Box 3

Hillsboro, OR 97123-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)VW Credit Leasing, Ltd.

End of Label Matrix

Mailable recipients 30

Bypassed recipients 1

Total 31